

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**JOINDER OF THE AD HOC GROUP OF
GENERAL OBLIGATION BONDHOLDERS TO AMBAC ASSURANCE
CORPORATION'S REQUESTS FOR RULE 2004 DISCOVERY**

The Ad Hoc Group of General Obligation Bondholders (the “GO Group”)² hereby submits this Joinder in *Ambac Assurance Corporation's Motion to Compel Compliance with the Court's December 15, 2017 and February 26, 2018 Orders Regarding the Urgent Renewed Joint Motion of the Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund Group, and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination* (Dkt. No.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Members of the GO Group file this Joinder exclusively on their own behalves and do not assume any fiduciary or other duties to any other creditor or person.

7505) and *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities* (Dkt. No. 7507, and together with Dkt. No. 7505, the "Rule 2004 Motions"). In support of this Joinder, the GO Group respectfully states as follows:

1. As the Rule 2004 Motions persuasively demonstrate, the relief requested in the Rule 2004 Motions is necessary both to enforce this Court's prior discovery orders and to ensure that creditors are afforded the broad discovery into "the liabilities and financial condition of the debtor" that is guaranteed by Federal Rule of Bankruptcy Procedure 2004.

2. Through this Joinder, the GO Group seeks to join in the relief requested in the Rule 2004 Motions, including, but not limited to, by receiving copies of any documents produced pursuant to the relief requested therein and by participating in any depositions taken in connection with the Rule 2004 Motions. The GO Group accordingly requests that any order entered by the Court resolving the Rule 2004 Motions expressly provide that the GO Group shall receive all documents produced and be entitled to participate in all depositions taken, pursuant to the relief requested in the Rule 2004 Motions.

3. Nothing herein shall prejudice the GO Group's right to independently seek Rule 2004 discovery from the Commonwealth of Puerto Rico, the Puerto Rico Fiscal Agency and Financial Advisory Authority, the Financial Oversight and Management Board for Puerto Rico, or any other party.

* * *

The Rule 2004 Motions should be granted.

Dated: June 27, 2019

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